

BELLSOUTH

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September 2, 1998

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Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
1919 M Street N.W., Room 222
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: CC Docket No. 95-116

Dear Mr. Caton:

The attached letter was delivered today to Ms. Kathryn Brown, Ms. Gayle Radley Teicher and Mr. Yog Varma of the Common Carrier Bureau.

In accordance with Commission rules, the original of this response and one copy are being filed with your office. Acknowledgement and date of receipt are requested. Please call the undersigned with any questions.

Cynthia Cox

cc: Ms. Kathryn Brown
Ms. Gayle Radley Teicher
Mr. Yog Varma

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September 2, 1998

Ms. Kathryn Brown
Chief, Common Carrier Bureau
Federal Communications Commission
1919 M Street, NW Room 500
Washington, D.C. 20554

Dear Ms. Brown:

As you've probably read, BellSouth implemented long-term local number portability (LNP) in the Atlanta MSA on August 24, 1998. Based on conversations I have had with Ms. Gayle Radley Teicher, I am providing this overview of our Phase 1, Atlanta MSA LNP implementation.

Testing Overview:

End-to-End testing was conducted in Atlanta during the period July 15 through August 14, 1998. Eleven (11) CLECs participated in this testing with BellSouth. All eleven CLECs participated in ordering and provisioning testing which included service order interface and validation testing, passing orders to BellSouth's Local Carrier Service Center, issuing preliminary subscription messages to the NPAC and sending final activate broadcast messages through the NPAC to BellSouth's LNP Gateway SMS. Nine of the eleven CLECs also participated in network call processing testing which included actual porting of telephone numbers between the BellSouth and CLEC network elements, initiating test calls to the numbers to validate switch software, translations, database integrity and routing instructions. Test calls were also made from the ported line to validate the capability of the line to access operator services, E911 and to properly generate a billing record. Two CLECs elected not to participate in call processing testing due to their state of network readiness at the time of testing.

LNP Implementation - Atlanta MSA:

BellSouth began accepting service orders for LNP on August 17, with network due dates of August 24, 1998. LNP went live in the Atlanta MSA on August 24, 1998 with all switches activated. BellSouth is querying on every intraLATA, inter-switch call and is providing default routing for calls that reach our switches undipped. This is also our plan

for all future phases. We are very encouraged by the performance of the BellSouth network elements, centers, LNP Gateway SMS, AIN SMS and other systems in a live LNP environment. Additionally, LNP implementation appears to be going well with regard to NPAC performance.

Shown below are the daily numbers ported totals since implementation:

	<u>8/24</u>	<u>8/25</u>	<u>8/26</u>	<u>8/27</u>	<u>8/28</u>	<u>8/29</u>	<u>8/30</u>	<u>8/31</u>	<u>9/1</u>
Nos. Ported	8	12	20	10	8	3	0	2	4

The above totals (67) are all numbers that have ported out. We have received one order for numbers to port in, however that order is not due until later in September.

Problems Encountered:

BellSouth has identified one software error in connection with its trouble administration function which resulted in a temporary disconnect of a ported number. A BellSouth Service Technician accessed the NPAC to respond to a trouble report from a CLEC. During this work, a record was accidentally changed to "inactive" which resulted in one line of a customer's account getting temporarily disconnected. BellSouth restored the customer service and while we are still investigating the exact cause of this problem, we have taken steps to ensure that technicians cannot alter these records on a going forward basis.

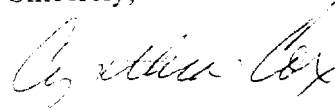
Obviously, I can only address BellSouth's problems and experiences not those of other carriers involved in the Atlanta implementation.

Future Phases:

Consistent with our most recent status report, we have completed internal quality assurance and system testing for the NPA Split Functionality. On September 2, we began industry testing. We remain on schedule to deliver both this functionality and the Expanded Filter functionality for use in our Phase III MSAs.

I hope this information is helpful. Again, BellSouth is pleased with our performance during this Phase 1 implementation which reinforces our view that we have built and deployed a very robust LNP capability. Feel free to call me with any questions on this matter.

Sincerely,

A handwritten signature in cursive script, appearing to read "Cynthia Cox".

Cynthia Cox

cc: Ms. Gayle Radley Teicher
Mr. Yog Varma